

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

JENS H.S. NYGAARD,

Plaintiff,

v.

FÉDÉRATION INTERNATIONALE DE  
L'AUTOMOBILE, FORMULA ONE  
MANAGEMENT LTD., FORMULA ONE  
WORLD CHAMPIONSHIP, MERCEDES-  
BENZ GRAND PRIX LTD., DAIMLER AG,  
LEWIS HAMILTON, RED BULL  
TECHNOLOGY LTD., RED BULL RACING  
LTD., FERRARI S.P.A., CHARLES LECLERC,  
and DALLARA AUTOMOBILI S.P.A.,

Defendants.

Case No. 6:20-cv-00234-ADA

JURY TRIAL REQUESTED

**NOTICE OF AGREED EXTENSIONS TO BRIEFING SCHEDULE**

Pursuant to this Court's Standing Order Regarding Joint or Unopposed Request to Change Deadlines entered on March 7, 2022, Plaintiff Jens H.S. Nygaard and Defendants Fédération Internationale de l'Automobile, Formula One Management Limited, Formula One World Championship Limited, Red Bull Technology Ltd., and Red Bull Racing Ltd. (hereafter referred to as "the Parties") hereby notify the Court that the Parties have agreed to extend the following dates related to briefing deadlines for dispositive motions and *Daubert* motions, as set forth in the Amended Scheduling Order (Dkt. 354), as follows:

Item	Original Deadline	Agreed Amended Deadline
Dispositive Motion Responses Due	June 3, 2022	June 10, 2022
Daubert Replies Due	June 17, 2022	June 21, 2022
Dispositive Motion Replies Due	July 1, 2022	July 15, 2022

The requested changes do not change the date for any hearing or trial, and do not affect the Court's ability to hold any scheduled hearing or trial, as all deadlines remain more than one month before the scheduled August 18, 2022 motions hearing.

Dated: May 31, 2022

Respectfully submitted,

By: /s/ Bailey K. Benedict

Danielle J. Healey  
Attorney in Charge  
Texas Bar No. 09327980  
healey@fr.com  
Brian G. Strand  
Texas Bar No. 24081166  
strand@fr.com  
Bailey Benedict  
Texas Bar No. 24083139  
benedict@fr.com  
Jacqueline T. Moran (*pro hac vice*)  
Texas Bar No. 24121740  
jtmoran@fr.com  
FISH & RICHARDSON P.C.  
1221 McKinney Street, Suite 2800  
Houston, Texas 77010  
Telephone: (713) 654-5300  
Facsimile: (713) 652-0109

Tommy Jacks  
Texas Bar No. 10452000  
jacks@fr.com  
FISH & RICHARDSON P.C.  
111 Congress Avenue, Suite 810  
Austin, Texas 78701  
Telephone: (512) 472-5070  
Facsimile: (512) 320-8935

Ahmed J. Davis (*pro hac vice*)  
Washington D.C. Bar No. 472321  
adavis@fr.com  
Julianne Campbell (*pro hac vice*)  
Washington D.C. Bar No. 1766159  
jcampbell@fr.com  
FISH & RICHARDSON P.C.  
1000 Maine Ave SW

Washington, D.C. 20024  
Telephone: (202) 783-5070  
Facsimile: (202) 783-2331

Nicholas Gallo (*pro hac vice*)  
Georgia Bar No. 546590  
gallo@fr.com  
FISH & RICHARDSON P.C.  
1180 Peachtree Street NE, 21<sup>st</sup> Floor  
Atlanta, Georgia 30309  
Telephone: (404) 892-5005  
Facsimile: (404) 892-5002

***Counsel for Plaintiff Jens H.S. Nygaard***

/s/ Jeffrey L. Johnson  
Claudia Wilson Frost  
State Bar No. 21671300  
Jeffrey L. Johnson  
State Bar No. 24029638  
Ryan C. Wooten  
State Bar No. 24075308  
ORRICK, HERRINGTON & SUTCLIFFE  
LLP  
609 Main, 40th Floor  
Houston, TX 77002  
Telephone: 713.658.6400  
Facsimile: 713.658.6401  
cfrost@orrick.com  
jj@orrick.com  
rwooten@orrick.com

Travis Jensen  
CA Bar No. 259925  
ORRICK, HERRINGTON & SUTCLIFFE  
LLP  
1000 Marsh Rd.  
Menlo Park, CA 94025  
Telephone: 650.614.7400  
Facsimile: 650.614.7401  
tjensen@orrick.com

Jeffrey T. Quilici  
State Bar No. 24083696  
ORRICK, HERRINGTON & SUTCLIFFE  
LLP

300 W. 6th Street, Suite 1850  
Austin, TX 78701  
Telephone: 512.582.6916  
Facsimile: 512.582.6949  
jqulici@orrick.com

***Counsel for Defendant Fédération  
Internationale de l'Automobile***

/s/ Harrison Rich

Douglas M. Kubehl  
State Bar Number 00796909  
doug.kubehl@bakerbotts.com  
Harrison Rich pro hac vice  
State Bar Number 24083730  
harrison.rich@bakerbotts.com  
Bethany R. Salpietra  
Facsimile: (214) 661-4816  
State Bar Number 24097699  
bethany.salpietra@bakerbotts.com  
BAKER BOTTS L.L.P.  
2001 Ross Avenue, Suite 900  
Dallas, TX 75201  
Telephone: (214) 953-6816

Richard B. Harper pro hac vice  
State Bar Number 4596615 (NY)  
Richard.harper@bakerbotts.com  
BAKER BOTTS L.L.P.  
30 Rockefeller Plaza  
New York, NY 10112-4498  
Telephone: (212) 408-2500  
Facsimile: (212) 408-2501

***Counsel For Defendants Formula One  
Management Limited and Formula One  
World Championship Limited***

/s/ Mark A. Chapman

Deron R. Dacus  
State Bar No. 00790553  
THE DACUS FIRM, P.C.  
821 ESE Loop 323, Suite 430  
Tyler, TX 75701  
Phone: (903) 705-1117

Fax: (903) 581-2543  
ddacus@dacusfirm.com

Edgar H. Haug (pro hac vice)  
Mark A. Chapman (pro hac vice)  
Jason Kanter (pro hac vice)  
Roman Khasidov (pro hac vice)  
HAUG PARTNERS LLP  
745 Fifth Avenue, 10th Floor  
New York, New York 10151  
Phone: (212) 588-0800  
Fax: (212) 588-0500

***Counsel for Defendants Red Bull Racing  
Ltd. and Red Bull Technology Ltd.***

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the above document was served on all counsel of record through the Court's CM/ECF system on May 31, 2022.

/s/ Bailey K. Benedict  
Bailey K. Benedict